

EXHIBIT B - Plaintiff's Complaint


**Service of Process
Transmittal**

02/18/2021

CT Log Number 539072500

TO: Sue Carlson
Target Corporation
1000 NICOLLET MALL
MINNEAPOLIS, MN 55403-2542

RE: Process Served in Nevada

FOR: Target Corporation (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: LUISA HOARD, etc., Pltf. vs. TARGET CORPORATION, etc, et al., Dfts.

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # A21829372C

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - -

ON WHOM PROCESS WAS SERVED: C T Corporation System, Carson City, NV

DATE AND HOUR OF SERVICE: By Process Server on 02/18/2021 at 02:25

JURISDICTION SERVED : Nevada

APPEARANCE OR ANSWER DUE: -

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 02/18/2021, Expected Purge Date: 02/23/2021

Image SOP

Email Notification, Non Employee Litigation Target gl.legal@target.com

REGISTERED AGENT ADDRESS: C T Corporation System
701 S. Carson Street
Suite 200
Carson City, NV 89701
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

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Electronically Issued
2/16/2021 1:40 PM

1 **SUMM**
2 **ADAM J. BREEDEN, ESQ.**
3 Nevada Bar No. 008768
4 **BREEDEN & ASSOCIATES, PLLC**
5 376 E. Warm Springs Road, Suite 120
6 Las Vegas, Nevada 89119
7 Telephone: (702) 819-7770
8 Facsimile: (702) 819-7771
9 Adam@Breedendandassociates.com
10 *Attorneys for Plaintiff*

11 **EIGHTH JUDICIAL DISTRICT COURT**

12 **CLARK COUNTY, NEVADA**

13 **LUISA HOARD, an individual,**

CASE NO.: A-21-829372-C

14 **Plaintiff,**

DEPT NO.: XXXI

15 **v.**

SUMMONS - CIVIL

16 **TARGET CORPORATION, a foreign**
17 **corporation; and DOES I through X, inclusive**
18 **and ROE CORPORATIONS I through X,**
19 **inclusive,**

20 **Defendants.**

21 **NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU**
22 **WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ**
23 **THE INFORMATION BELOW.**

24 **TO THE DEFENDANT:**

25 **TARGET CORPORATION**

26 **A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth in the**
27 **Complaint.**

28 **1. If you intend to defend this lawsuit; within 21 days after this Summons is served on you,**
exclusive of the day of service, you must do the following:

(a) File with the Clerk of this Court, whose address is shown below, a formal written
response to the Complaint in accordance with the rules of the Court, with the
appropriate filing fee.

(b) Serve a copy of your response upon the attorney whose name and address is

Case Number: A-21-829372-C

2-22-2021

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1 shown below.

- 2 2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and
 3 failure to so respond will result in a judgment of default against you for the relief
 4 demanded in the Complaint, which could result in the taking of money or property or
 5 other relief requested in the Complaint.
 6 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly
 7 so that your response may be filed on time.
 8 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board
 9 members, commission members and legislators each have 45 days after service of this
 10 Summons within which to file an Answer or other responsive pleading to the Complaint.

11 Issued at the request of:

12 BREEDEN & ASSOCIATES, PLLC

CLERK OF THE COURT

13 
 14 ADAM J. BREEDEN, ESQ.

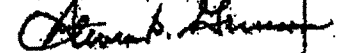
 2/17/2021

15 Nevada Bar No. 8768
 16 376 E. Warm Springs Road, Suite 120
 17 Las Vegas, Nevada 89119
 18 Phone: (702) 819-7770
 19 Fax: (702) 819-7771
 20 Adam@Breedendassociates.com
 21 Attorneys for Plaintiff

Deputy Clerk Date
 Clark County Regional Justice Center
 Eighth Judicial District Court
 200 Lewis Ave., Third Floor
 Las Vegas, NV 89155

Demand Palmer

Electronically Filed
2/12/2021 10:44 AM
Steven D. Grierson
CLERK OF THE COURT



1 **COMP**
2 **ADAM J. BREEDEN, ESQ.**
3 Nevada Bar No. 008768
4 **BREEDEN & ASSOCIATES, PLLC**
5 376 E. Warm Springs Road, Suite 120
6 Las Vegas, Nevada 89119
7 Telephone: (702) 819-7770
8 Facsimile: (702) 819-7771
9 Adam@Breedendassociates.com
10 *Attorneys for Plaintiff*

CASE NO: A-21-829372-C
Department 3

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

LUISA HOARD, an individual,

Plaintiff,

v.

TARGET CORPORATION, a foreign
corporation; and DOES I through X, inclusive
and ROE CORPORATIONS I through X,
inclusive,

Defendants.

CASE NO.:

DEPT NO.:

COMPLAINT

Plaintiff, LUISA HOARD, by and through her attorney of record, Adam J. Breeden, Esq.,
of the law firm of BREEDEN & ASSOCIATES, PLLC, hereby alleges the following for her
Complaint:

PARTIES AND VENUE

1. Plaintiff, LUISA HOARD (hereinafter referred to as "Plaintiff" and/or
"Mrs. Hoard") is a resident of and citizen of the State of Nevada, County of Clark, and was at all
times relevant to this Complaint.

2. Defendant, TARGET CORPORATION, a foreign corporation (hereinafter referred
to as "Target"), is a company duly licensed to operate and conduct business in Clark County, Nevada
with its Corporate Headquarters located in Minneapolis, Minnesota.

3. This Court has personal jurisdiction over the Defendant because the Complaint arises
from an incident that occurred at one of Defendant's stores in Clark County, Nevada where it

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2-22-2021

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1 regularly conducts business and has the minimum contacts required.

2 4. This Court has subject matter jurisdiction over this matter pursuant to Nev. Const.
3 Art. VI, § 6 and NRS § 4.370(1), as this Court has original jurisdiction in all cases not assigned to
4 the justices' courts and the amount in controversy exceeds \$15,000, exclusive of attorney's fees,
5 interest, and costs.

6 5. All the facts and circumstances that give rise to this dispute and lawsuit occurred in
7 Clark County, Nevada, making venue in the Eighth Judicial District the appropriate venue.

8 6. The true names and capacities, whether individual, corporate, associate, or otherwise,
9 of Defendants DOES I through X, inclusive, and ROE CORPORATIONS I through X, inclusive,
10 are unknown to the Plaintiff, who therefore sues these defendants by such fictitious names. Plaintiff
11 is informed and believes and thereon alleges that each of the Defendants designated herein as a Does
12 I through X, inclusive, and/or Roe Corporations I through X, inclusive, is responsible in some
13 manner for the events and happenings herein referred to and caused injury and damages proximately
14 thereby to Plaintiff as herein alleged, and Plaintiff will ask leave of this Court to amend this
15 Complaint to insert the true names and capacities of Defendants DOES and/or ROE
16 CORPORATIONS when the same have been ascertained by Plaintiff, together with appropriate
17 charging allegations, and adjoin such Defendants in this action.

18 7. DOES I through X include, but are not limited to, presently unknown employees of
19 Defendant, TARGET CORPORATION, who are responsible for floor maintenance.

20 8. ROE CORPORATIONS I through X include, but are not limited to, presently
21 unknown employers or principals of Defendant DOES I through X.

22 GENERAL ALLEGATIONS

23 9. On or about March 7, 2019, Mrs. Hoard was a patron at the Target store located at
24 4001 S. Maryland Parkway in Las Vegas, Nevada.

25 10. At the aforementioned time and date, Mrs. Hoard was shopping with her husband
26 and when she approached the register to check out, she slipped on a clear liquid believed to be water
27 on the floor causing her to violently fall to the ground.

28 11. At the time of the accident, no caution, wet floor or other signs were in use.

1 12. Employees of Target failed to properly keep the premises in a reasonably safe
2 condition for use causing Mrs. Hoard to slip and fall on the wet floor surface.

3 13. Employees of Target were on actual or constructive notice of the foreign substance
4 on the floor.

5 14. Employees of Target failed to properly display warning of the wet floor to the store's
6 patrons.

7 15. On information and belief, Defendant, TARGET CORPORATION, was and is the
8 employer of DOES I through X and is responsible for the acts of its employees based on that agency
9 relationship and respondeat superior.

10 16. Due to the slip and fall, Mrs. Hoard suffered serious injury to her right knee,
11 including a broken patella requiring surgical repair, which has caused her severe pain and suffering,
12 and she has incurred or will incur medical expenses exceeding \$85,000 and other damages related
13 to said injuries.

14 **FIRST CAUSE OF ACTION**
15 **(Negligence - Against All Defendants)**

16 17. Plaintiff re-states and incorporates all prior allegations set forth in this Complaint as
17 if fully restated herein.

18 18. At the time stated herein, Target had a common law and non-delegable duty to keep
19 its premises in a reasonably safe condition for use.

20 19. Target breached said duty by allowing a dangerous condition to exist, i.e. a foreign
21 substance on the floor for which Target had actual or constructive knowledge.

22 20. At the time stated herein, Defendants DOES I-X, had a duty to exercise reasonable
23 care of the kind exercised by an ordinary, prudent person under the circumstances to assure that
24 his/her work did not endanger or harm others.

25 21. DOES I – X breached said duties by failing to properly maintain the premises and
26 remedy hazardous conditions prior to allowing patrons to enter the premises.

27 22. The Defendants' breach of their duty was the proximate cause of the incident and the
28 injuries sustained by Mrs. Hoard.

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